

## REMARKS

In Applicants' invention as now set forth in amended independent Claim 55, there is provided an imaging apparatus including a photoelectric conversion device having a plurality of substrates, wherein each substrate has a plurality of photoelectric conversion elements thereon. The substrates are arranged adjacent each other in a plane and a wavelength converting member is arranged on the photoelectric conversion elements. Also, a control circuit is provided for driving the device, wherein the control circuit and the photoelectric conversion device are disposed within a housing, with a ground member being coupled between the housing and the wavelength converting member. In this regard, amended Claim 55 is further characterized by a resin that seals at least a portion of the substrates and of an end face of the conductive member, wherein the substrates and conductive member are in close proximity with each other.

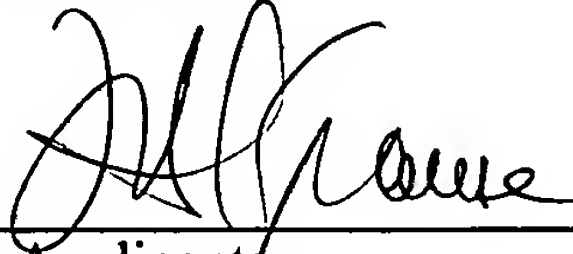
New independent Claim 56 is similar to amended Claim 55, but does not refer to the housing or the substrates. However the above "characterized" portion of Claim 55 is included in Claim 56 which also requires a resin seal.

As a result of this claimed structure an advantage is obtained over the prior art, wherein water is excluded from the inner portions of the device. The cited Crowell patent does not disclose the above-characterized structure as set forth in independent Claims 55 and 56.

For all these various reasons Applicants respectfully submit that all of the claims in the application are allowable, and the issuance of a formal notice of Allowance is solicited

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



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